

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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|--------------------------------------|---|-----------------------|
| GETTY IMAGES (US), INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | C.A. No. 23-135 (GBW) |
| |) | |
| STABILITY AI, LTD. and STABILITY AI, |) | |
| INC., |) | |
| |) | |
| Defendants. |) | |

[PROPOSED] ORDER GRANTING PLAINTIFF'S DISCOVERY MOTION

WHEREAS, on May 2, 2023, Defendants Stability AI, Ltd. and Stability AI, Inc. (“Defendants”) filed a Motion to Dismiss or Transfer this Action (D.I. 16, the “Motion”) arguing, *inter alia*, a lack of personal jurisdiction over Defendant Stability AI, Ltd.;

WHEREAS, on May 12, 2023, Plaintiff Getty Images (US), Inc.’s (“Plaintiff,” and collectively with Defendants, the “Parties”) served Jurisdictional Interrogatories and Jurisdictional Requests for the Production of Documents on each of the Defendants (D.I. 20);

WHEREAS, on June 9, 2023, the Court granted the Parties stipulated and agreed upon schedule for the completion of jurisdictional discovery and briefing on the Motion, and ordered Defendants to complete document production and serve interrogatory responses by July 7, 2023, and depositions related to jurisdictional discovery to be completed by July 21, 2023 (D.I. 21);

WHEREAS, on July 13, 2023, the Parties filed a joint letter seeking judicial intervention concerning whether and to what extent Defendants must further respond to jurisdictional discovery (D.I. 23);

WHEREAS, pursuant to this Court’s July 14, 2023 Order (D.I. 24), Plaintiff submitted a discovery dispute letter on July 18, 2023 and Defendants submitted a response on July 20, 2023; and

WHEREAS, Plaintiff's answering brief in opposition to the Motion is presently due on or before July 31, 2023, and Defendants' reply in support of their Motion is presently due on or before the later of August 21, 2023 and twenty-one (21) days after Plaintiff files its brief in opposition (D.I. 21);

NOW, THEREFORE, the Court, having reviewed the papers submitted by the Parties, GRANTS Plaintiff's discovery motion:

Defendant is hereby **COMPELLED** to:

(1) Produce responsive documents and answer interrogatories in response to Plaintiff's Jurisdictional Interrogatories and Jurisdictional Requests for the Production of Documents, as described in Plaintiff's letter (D.I. ____), no later than seven (7) days from the date of this Order;

(2) Produce a witnesses for deposition on a mutually convenient date for the parties within ten (10) days after completing their production of the additional discovery;

It is further **ORDERED** that:

(3) The time for Plaintiff to file an answering brief in opposition to the Motion is extended through and including thirty (30) days from the date of this Order;

(4) The time for Defendants to file a reply brief in further support of the Motion is extended through and including twenty-one (21) days after Plaintiff files its answering brief.

July 18, 2023

SO ORDERED this ____ day of July, 2023.

Gregory B. Williams
United States District Judge